REMARKS

In response to the Office Action dated March 15, 2005, Applicant respectfully requests reconsideration and withdrawal of the rejections of the claims and objection to the disclosure.

The disclosure was objected to on the grounds that the specification does not contain headings for the various sections thereof. It is respectfully noted, however, that appropriate headings were added via the Preliminary Amendment filed September 4, 2001. The Examiner is requested to confirm that the Preliminary Amendment has been properly entered.

Claims 4 and 5 were rejected under the first paragraph of 35 U.S.C § 112, on the grounds that they were not considered to be supported by the disclosure. This rejection appears to be based upon an interpretation of claim 4 to mean that the storage card comprises a reader. Upon reading the specification, it is respectfully submitted that a person of ordinary skill in the art would understand that it is the claimed machine that further includes a reader, not the storage card, per se. However, to avoid any possible misinterpretation of the claim, it has been amended to explicitly recite that the machine further includes a reader. Reconsideration and withdrawal of the rejection is respectfully requested.

Claims 1, 3, 14, 17 and 18 were rejected under 35 U.S.C. § 103, on the grounds that they were considered to be unpatentable over the Cummins et al patent (U.S. 5,980,011), in view of the Edgar patent (U.S. 5,587,728). Claims 2 and 6-11 were rejected on the basis of these two patents, in view of various tertiary references. Claims 4, 5, 12, 13, 15 and 16 were identified as containing allowable subject matter, which is noted with appreciation.

It is respectfully submitted that the Cummins and Edgar patents do not teach the subject matter of the rejected claims to a person of ordinary skill in the art, even when they are considered in combination. The Cummins patent discloses a system for printing information on identification cards. This system includes an inkjet printer and a controller that controls the operation of the printer, among other components of the system. As acknowledged in the Office Action, however, the Cummins patent does not disclose a computer-aided vision device having at least one video camera for the dynamic measurement of geometric and/or positioning parameters of the identification cards. This is due to the fact that the system of the Cummins patent employs a tray 20 that holds the cards in precise positions for the magnetic encoding and printing operations. See, for example, the discussions beginning at column 3, line 48. As a result of this arrangement, the position and orientation of the cards is predetermined, and hence there is no need to perform dynamic measurement of geometric and/or positioning parameters.

Recognizing this distinction, the Office Action relies upon the disclosure of the Edgar patent. The Action states that the Edgar patent discloses a computer-aided vision device having at least one video camera, and references sensors 122 and 123. It is to be noted that the reference numbers 122 and 123 are not present in the Edgar patent. It appears that the Office Action is referring to the linear sensor 105 depicted in Figures 5A and 5B of the patent.

It is respectfully submitted that the linear sensor of the Edgar patent does not constitute a video camera that is used to measure geometric and/or positioning parameters of a card medium. Rather, this sensor is employed to measure the intensity, or density, of ink printed on a substrate in a multi-pass operation. More

particularly, as illustrated in Figure 1B of the patent, when an image is printed with a single-pass process, the actual density of the ink can vary from that which desired. To alleviate this situation, the Edgar patent discloses a multi-pass process, as depicted in Figures 2A-2C. In the first pass, the ink is printed at a density less than that which is ultimately desired, e.g. 70%. In subsequent passes, an image of the printed substrate is generated by the linear sensor 105, and used to calculate the amount of ink to be printed for each pixel to approach the desired density. See, for example, column 2, lines 6-26.

It is respectfully submitted that this teaching does not disclose the claimed subject matter to a person of ordinary skill in the art. First, the Edgar patent is not directed to the printing of cards, as in the case of the Cummins patent. Rather, it merely discloses printing on a "substrate," such as a sheet of paper as illustrated in Figure 3. In this type of environment, there is no need to dynamically measure the geometric and/or positioning parameters of the medium being printed, since they are already known.

Second, even if the printer of the Edgar patent were applied to the printing of cards, such as the system of the Cummins patent, there is still no suggestion to employ a video camera for the dynamic measurement of geometric and/or positioning parameters of the cards. The Edgar patent only discloses the use of the linear sensor for the purpose of measuring the density of ink on successive passes of the print head, to approach a desired value. Neither the Cummins patent nor the Edgar patent is concerned with selective printing within a confined area, where the location of the area may vary due to card manufacturing tolerances and/or

positioning on a transport mechanism. Hence, they do not suggest a solution to such a concern, as embodied in the claimed subject matter.

For at least the foregoing reasons, it is respectfully submitted that claims 1-3, 6-11, 14, 17 and 18 are patentable over the references of record. The tertiary references cited in the rejections of claims 2 and 6-11 do not overcome the differences between the subject matter of these claims and the disclosures of the Cummins and Edgar patents, discussed above. Reconsideration and withdrawal of the rejections, and allowance of all pending claims is respectfully requested.

Respectfully submitted,

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